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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-3104

oea/AML

DEC 22 1997

Karl Siderits
Forest Supervisor
National Forests in Mississippi
100 W. Capital St., Suite 1141
Jackson, MS 39269

SUBJECT: Recreational Lake and Complex on Porter Creek, Homochitto Ranger District,
Franklin County, Mississippi Draft Environmental Impact Statement

Dear Mr. Siderits:

Pursuant to Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act, we have reviewed the above referenced document that describes impacts associated with the development of a recreational reservoir and complex on Porter Creek in Franklin County. Seven alternatives are presented which describe a dam at three potential sites on Porter Creek. Depending on the dam's location and height, the reservoir would inundate from 650 to 1160 acres of floodplain and adjacent uplands. The 1160 acre reservoir is the preferred action. Located in an economically depressed area of Mississippi, the recreational complex would provide employment opportunities for the local populace.

We commented previously on a draft document for this project in a June 30, 1993 letter to your agency. Most of the comments we made are still applicable. We remain concerned about the loss of existing natural resources which include stream channel, riparian zones wetlands and upland hardwood forest. These impacts are adequately discussed. Some of these impacts can be offset to various degrees with mitigation proposed in the document. But to a large degree, the project would convert a stream/ forested floodplain system into a standing-water lake environment.

A major problem that was not adequately addressed in the current document is the probable degradation of reservoir water quality by sewage discharged into Porter Creek and other drainage ways from inadequate residential treatment systems. Fifty-nine percent of the residences surveyed in the watershed had unapproved or malfunctioning sewage treatment systems. It would be imprudent from health, esthetic and aquatic resource perspectives to move forward with a recreational facility without eliminating this problem.

The document states that your agency is recommending that sewage problems be resolved through county zoning changes and through the development of on-site or off-site sewage disposal facilities for residents who have substandard systems. The use of greentree reservoirs (seasonally-inundated wetland impoundments) at the upper end of the proposed lake and in major drainage ways to the lake is also suggested.

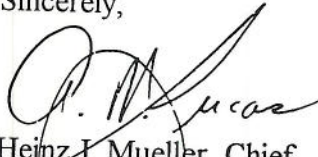
We do not believe that the use of greentree reservoirs is a desirable option. Although wetlands can assimilate nutrients, their use as filters for sewage is, from health and esthetic perspectives, not compatible with this type of project. Greentree reservoirs would probably be only partially effective for this purpose, especially on Porter Creek. During periods of high flow, most of the bacteria and nutrients in Porter Creek would enter the upper end of the lake and degrade water quality. A greentree reservoir on the Creek at the upper end of the lake would essentially be an extension of the lake. No part of a recreational facility should be used to treat sewage.

The sewage problem should be resolved through the implementation of a county watershed zoning plan that limits incompatible development in the watershed and requires adequate sewage treatment facilities for existing and future development. We believe that these elements must be in place prior to the initiation of the construction phase of this project. This issue should be resolved, and the mitigating actions should be presented in the Final EIS. Our agency would object to any Corps of Engineers Section 404 permit for this project if this issue is not resolved prior to the construction of the reservoir. Mike Wylie of our Wetlands Regulatory Program (404-562-9409) should be contacted for further discussion on this issue and needed mitigation for the loss of wetland resources.

We rate this document EC-2. Our review has identified environmental impacts that should be avoided in order to fully protect the environment. Additional information on water quality protection is needed to fully evaluate the impacts from this project.

We appreciate the opportunity to comment on this matter. Any questions on our comments should be addressed to Allen Lucas at 404/562-9624.

Sincerely,


for: Heinz J. Mueller, Chief
Office of Environmental Assessment
Environmental Accountability Division

cc: Mike Wylie, Wetlands Regulatory Branch

SUMMARY PARAGRAPH FORM

PAGE #2

ERP NUMBER:

D-AFS-E65050-MS

RATING ASSIGNED:

EC-2

NAME OF EPA OFFICIAL RESPONSIBLE
FOR REVIEW OF PROJECT:

AL LUCAS

SUMMARY OF COMMENT LETTER:

expressed environmental concerns about loss of
EPA review found that floodplain resources would be
~~lost and that water quality problems in the watershed need to be~~
~~resolved prior to initiation of project construction~~ *from potential*
sewage discharge.

Paragraph Approved for Publication

Initials of OFA Approving Official